



Re: Got your voicemail 
Dave Bartus to: Elaine Eby

06/22/2011 10:56 AM

Thanks, Elaine. The "traditional" argument put forth by the Department of Energy and their contractors is that the wastes in question consist of large pieces of equipment, or large containers or boxes containing large or odd-shaped debris that would be impractical to treat outside of a land disposal unit, then place the treated waste in the unit. Energy further argues that the wastes in question are considered "debris" under the RCRA regulations, and thus eligible for treatment via macroencapsulation under the debris rule treatment standards. All are non-wastewaters.

What we see in practice, at least currently, is that what is actually being managed is containerized waste in 208-l drums, overpacks, or smaller waste boxes. Some of the waste meets the definition of debris, some does not, and may designate for any of a range of waste codes. None of the containers we have observed being treated in a landfill unit, or that are being considered for in-trench treatment, pose any specialized handling requirements. Therefore, the question is not specific to any particular treatability group or sub-group.

During an NEIC inspection at Hanford this spring, we obtained an engineering analysis of transport and lifting equipment available on-site and that can be used to place large items in the land disposal units in question. Based on this analysis, loads up to something like 180,000 lbs (a very substantial load) can be moved into the land disposal unit and lifted from a transport vehicle and placed in the landfill based on the capacity of the lifting equipment, transport vehicles, and load-bearing capacity of the operations layer of the landfill and the access ramp to the unit. We conclude that this analysis suggests that all but the most extraordinary wastes can be treated outside the land disposal unit then placed in it for disposal without the need for in-trench treatment.

Hope this helps.

Dave

Elaine Eby

[Hi Dave- Got your voicemail and Steve Silverma...](#)

06/22/2011 09:38:15 AM

From: Elaine Eby/DC/USEPA/US
To: Dave Bartus/R10/USEPA/US@EPA
Date: 06/22/2011 09:38 AM
Subject: Got your voicemail

Hi Dave-

Got your voicemail and Steve Silverman our attorney in OGC is looking at your questions, (didn't to remind him today) He asked for some information on treatability groups, don't know where it will lead but will get back to you shortly.

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